

UNITED STATES DISTRICT COURT

for the
Southern District of OhioIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)Brandon Jamal Campbell
(M/B, DOB: 5/5/2001)

Case No. 2:22-mj-45

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Search Warrant Affidavit Attachment A, incorporated here by reference,

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

See Search Warrant Affidavit Attachment B, incorporated here by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 USC § 2114 (a)	Robbery of mail, money, or other property of the United States

The application is based on these facts:

See Search Warrant Affidavit, incorporated here by reference.

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Mark V. Massaro, United States Postal Inspector
Printed name and title

Sworn to before me and signed in my presence.

Date: January 26, 2022

City and state: Columbus, Ohio


Kimberly A. Johnson
United States Magistrate Judge



AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Mark V. Massaro, being duly sworn, state as follows:

1. I am a U.S. Postal Inspector with the U.S. Postal Inspection Service in Columbus, Ohio, and have been so employed since August 2013. I am a sworn federal law enforcement officer empowered to investigate criminal activity involving or relating to the United States Postal Service (“USPS”) and/or U.S. Mail. The crimes investigated include those such as theft, burglary, counterfeiting, robbery, assault, homicide, dangerous mailings, narcotics, identity theft, and fraud. I received initial training for these types of investigations through the U. S. Postal Inspection Service, Basic Inspector Training. I have received additional on the job training for each of my assigned investigative functions.
2. This affidavit is based on personal knowledge derived from my participation in this investigation, as well as information provided to me by other law enforcement officers and witnesses.
3. This affidavit is submitted in support of an order authorizing the search of Brandon Jamal Campbell’s person, and does not set forth all my knowledge about this matter.

PERSON TO BE SEARCHED

4. This affidavit is provided in support of applications for a search warrant authorizing the collection of deoxyribonucleic acid (“DNA”) to be collected by use of a buccal swab from the person of Brandon Jamal Campbell, male/black, with a date of birth 5/5/2001, and FBI Number FCX73PCPH. Campbell is currently detained on federal felony charges in the Franklin County Jail, located at 370 South Front Street, Columbus, Ohio, which is within the Southern District of Ohio. Campbell is being held pending trial for violations of Title 18, United States Code, Section 2114(a) – robbery of mail, money, or other property of the United States.

DETAILS OF THE INVESTIGATION

5. On September 8, 2021, at approximately 01:30PM EST, a USPS Letter Carrier (“Victim #1”) was delivering mail in the Vistas at Rocky Fork apartment complex in Gahanna, Ohio. Victim #1 had been delivering in the complex for approximately two hours. As Victim #1 was approaching a bank of mailboxes in front of 947 Vista Drive, he observed two unknown black males. One was wearing a yellow hoodie with black Adidas athletic pants (Suspect #1). The other was wearing a black hoodie and similar dark pants (Suspect #2). Both suspects were wearing black full-face masks, commonly referred to as a balaclava. Victim #1 reported that both suspects were in their late teens to early twenties and had slim builds.
6. As Victim #1 began to open the mailbox at 947 Vista Drive, he heard footsteps suddenly approaching him from behind. Suspect #1 reached over Victim #1’s right side/shoulder

and pushed him aside with his left hand. Suspect #1 was holding a green handgun in his right hand, which he braced against the wall area about the mailboxes as he was simultaneously pushing Victim #1 aside with his left hand. Victim #1 described the handgun as being like a Glock.

7. Victim #1 backed slightly away as Suspect #1 withdrew the key from the mailbox. Suspect #1 then demanded the key to Victim #1's postal vehicle. Victim #1 retrieved his postal vehicle key and gave it to Suspect #1. Victim #1 reported that Suspect #2 was standing back some distance while Suspect #1 took the keys from him. Both suspects then ran towards the northern portion of the apartment complex. Victim #1 ran back towards his postal vehicle which he had left parked in front of 571 Vista Drive.
8. A maintenance employee in the area during the robbery observed two African American males, one wearing a yellow hooded sweatshirt, get into a "champaign colored 4 door sedan and pull away from carport area #165." Based on the information given, Gahanna Police Crime Analyst Roush was able to identify a possible suspect vehicle leaving the area at the time of the robbery on traffic cameras. Gahanna Detective Glunt used the image of a champagne-colored Saturn Aura to compare to the apartment complex surveillance camera footage. Detectives were able to identify a possible suspect vehicle based on this information. The suspect vehicle had distinctive after-market rims and an illegible temporary license plate on the rear.
9. Gahanna Detectives and Postal Inspectors used records provided by the Ohio Bureau of Motor Vehicles to identify all champagne-colored Saturn Auras registered in the Columbus, Ohio area. Using law enforcement resources, a vehicle with matching rims, make, and model was located at 89 Eastpointe Ridge Drive belonging to Brandon Jamal Campbell. Campbell has a prior criminal record for receiving stolen property, obstructing official business, and improper handling of a firearm.
10. Gahanna Detective Thomas wrote a vehicle GPS warrant for the Saturn Aura belonging to Campbell. The vehicle GPS warrant was signed on September 10, 2021, by Franklin County Municipal Court Judge Andrea Peeples. Postal Inspectors located the vehicle at 89 Eastpointe Ridge Drive, Columbus, Ohio, and installed the GPS tracking device on September 15, 2021.
11. Continuing on September 15, 2021, Gahanna Police Detectives observed and photographed Campbell in and out of the vehicle in the area of 3583 Cypress Club Way in the Gardens Apartments. Campbell was wearing black shorts, a white t-shirt, and a black balaclava style full-face mask. Detective Thomas contacted Victim #1 after seeing Campbell wearing the balaclava mask. A google image of a similar balaclava mask was sent to Victim #1 to determine the similarity in the facial covering. Victim #1 reported that the image matched the one that the suspect was wearing at the time of the robbery.
12. On September 16, 2021, Postal Inspectors were notified that a different USPS Letter Carrier ("Victim #2") was robbed while delivering mail at approximately 02:50PM EST near 4500 Hemingway Court, Columbus, Ohio. Victim #2 stated that the suspects

demanded his postal keys and brandished a tan firearm. The suspects of the robbery were described as two black males, in their teens to mid-twenties, possibly shirtless, wearing dark pants and full-face masks with slits for eyes. Gahanna Detectives were able to pull GPS data from the tracking device that had been installed on the Saturn Aura and observed Campbell's vehicle near 4500 Hemingway Court around 02:40 PM EST.

13. Gahanna Detectives and Postal Inspectors used GPS data to locate the vehicle following the robbery. The vehicle was located near the robbery site on Noe Bixby Road, in an apartment complex on Cedar Drive, Columbus, Ohio. Two black males were observed shirtless in the car attempting to leave the area. Postal Inspectors attempted to stop them utilizing lights and sirens. Both suspects exited the vehicle and ran into 5200 Cedar Drive Apartment G, Columbus, Ohio. One suspect was seen leaving the area on foot, running from officers towards Interstates 270 and 70. Suspected narcotics were seen in plain view inside of the vehicle they fled from, along with a gold iPhone cellular phone.
14. The same day, Gahanna Police Detective Thomas wrote a search warrant application for the residence of 5200 Cedar Drive Apartment G, which was approved by Franklin County Municipal Court Judge Andrea Peeples. The search warrant was executed by Gahanna Division of Police detective bureau members and United States Postal Inspectors. A black male (Subject #1) was located inside. Subject #1 was not one of the individuals seen fleeing the scene. Subject #1 confirmed that Campbell had been inside the apartment. The confirmation was made after being shown an image of Campbell. While searching the apartment, officers located a black balaclava above the fridge, in addition to four handguns. Two of the handguns recovered were tan in color.
15. Campbell's Saturn Aura was towed to the Gahanna Police Department following the incident. A search warrant was then executed on the suspect vehicle. Inside the vehicle, officers found a gold iPhone. On September 22, 2021, Franklin County Municipal Court Judge Cindi Morehart approved a search warrant to examine the contents of that phone. A full-file system extraction was later completed on the iPhone. User info contained the iPhone showed that it belonged to Campbell. Location data in the system extractions show that Campbell's phone was located at or around 947 Vista Drive on September 8, 2021, at approximately 01:27PM EST. Additionally, location data in the system extractions show that Campbell's phone was located at or around 4500 Hemmingway Court on September 16, 2021, at approximately 02:32PM EST.
16. Detective Thomas submitted the black balaclava mask seized from 5200 Cedar Drive, Apartment G, to the Ohio Bureau of Criminal Investigation laboratory for DNA analysis. On November 09, 2021, a lab report showed a possible investigative lead between a DNA sample taken from the black balaclava mask and a DNA profile for Campbell on file with the Combined DNA Index System ("CODIS"). Further forensic analysis is required to determine whether the DNA sample from the black balaclava mask matches a known sample from Campbell.
17. On December 14, 2021, a grand jury returned a two-count indictment against Campbell, charging him with robbery of mail, money, or other property of the United States, in

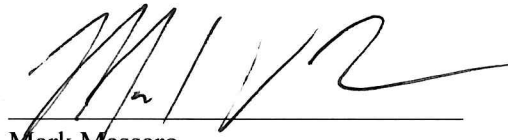
violation of Title 18, United States Code, Section 2114(a), for the robberies of Victim #1 and Victim #2 described above, in Southern District of Ohio Case Number 2:21-CR-245.

DNA

18. Based on my training, experience, and consultation with forensic experts, I know that: DNA is a molecular material found in virtually all cells of the body. DNA from a person's blood is the same as DNA from the person's semen, saliva, or other tissue. The DNA analysis performed in forensic laboratories examines multiple genetic markers. The compilation of the results for each marker is called a genetic profile. It is possible to obtain DNA typing results from stains that are barely visible or objects that have been merely handled by an individual. A genetic profile developed from a crime scene or evidentiary sample can then be compared with reference samples from the individuals allegedly connected to the incident. A forensic expert can conclude, with reasonable scientific certainty, that DNA obtained from a crime scene or from recovered evidence does or does not match that of a known individual. Reference samples are commonly collected by means of a buccal swab, a method by which a sterile swab is used to collect the cell samples from the inside of an individual's cheek.

CONCLUSION

19. Based on the information set forth in this affidavit, I submit there is probable cause to believe that the individual identified as Brandon Jamal Campbell violated Title 18, United States Code, Section 2114(a) – that is, robbery of mail, money, or other property of the United States. In light of the facts outlined above and my training and experience in the investigation of robberies and related crimes, I believe there is a fair probability that, contained inside of Brandon Jamal Campbell, there is evidence of the aforementioned violations. More specifically, I respectfully submit there is probable cause to obtain buccal (cheek) swabs from Campbell for the purpose of obtaining a reference sample of his DNA for further comparison to the DNA sample(s) taken from the black balaclava mask seized in connection with a search of 5200 Cedar Drive, Apartment G.
20. I request this Application be sealed until further order of the Court. As detailed above, this affidavit discusses an ongoing criminal investigation and contains information about victims and witnesses to the crimes. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation and the safety of victims and witnesses.



Mark Massaro
United States Postal Inspector

Subscribed and sworn to before me this 26th day of January, 2022.


Kimberly A. Johnson
United States Magistrate Judge

ATTACHMENT A

Person or Property to be Searched

The body of Brandon Jamal Campbell, further identified as male, black, with a date of birth of May 5, 2001, currently located in the Franklin County Jail, Columbus, Ohio.

ATTACHMENT B

Items to be Seized

Based upon the information provided above, I have probable cause to believe that now contained in the body of Brandon Jamal Campbell (M/B, DOB: 5/5/2001), are items described below that constitute evidence of violations of Title 18, United States Code, Section 2114(a):

- Saliva, and or topical or oral skin cells, to be obtained by means of an oral swab.